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**VIA ECF**

March 18, 2024

Hon. Lee G. Dunst  
Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Agudelo et. al. v. Recovco Mortgage Management LLC et. al.*, Case No. 22-cv-4004

Dear Magistrate Judge Dunst:

This law firm represents Plaintiffs in the above-captioned matter. We submit this joint status update pursuant to the Court's order of March 12, 2024.

Per Judge Azrack's order of February 12, 2024, discovery in this case is stayed and Defendants Wright and Salzman's motions to dismiss have been denied without prejudice to renew after Plaintiffs' anticipated motion to amend is resolved. Plaintiffs are prepared to move forward with filing their Motion to Amend, and request to do so by April 5, 2024.

Plaintiffs propose the following letter briefing schedule: Plaintiffs submit their letter motion to amend by April 5, 2024, with Defendant Wright to respond within 10 business days (i.e. April 19, 2024). Plaintiffs have conferred with Mr. Salzman concerning his response time and, due to his status as a pro se Defendant, Plaintiffs have consented to April 26, 2024, for Mr. Salzman's response.

Mr. Salzman also requests that he be permitted 10 pages in his response to Plaintiffs' letter motion to amend. He writes, "this is a complex matter and may involve me addressing several issues of procedure, fact, and law." Plaintiffs do not consent to this request.

Further, Plaintiffs note that Defendants Strauss and Recovco have failed to retain counsel as they were ordered to do by March 8, 2024. *See* Order Jan. 9, 2024. Plaintiffs have reason to believe that Defendant Strauss is receiving their communications and ignoring them. Defendants' former attorney Marc Wenger also represented in his January 5, 2024, letter to the Court that his

firm had informed Strauss and Recovco that they would need to retain new counsel. *See* ECF No. 222, p. 1, n. 1; ECF No. 223. Therefore, Plaintiffs seek permission to file a default motion following the resolution of the motion to amend, assuming Strauss and Recovco do not appear and respond.

Sincerely,

/s/ Scott Simpson

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